

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

BEGASHAW AYELE, Pro Se,  
Plaintiff,

vs.

U.S. SECURITY ASSOCIATES, INC.,  
Defendants.

Case No.: 05-11273 WGY

**DEFENDANT U.S. SECURITY ASSOCIATES, INC.'S MOTION TO EXTEND TIME TO  
ANSWER OR OTHERWISE RESPOND TO THE COMPLAINT OF PRO SE  
PLAINTIFF BEGASHAW AYELE**

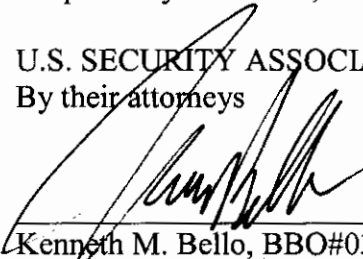
Defendant U.S. Security Associates, Inc. ("U.S. Security") hereby requests an extension of time to Answer or Otherwise Respond to the Complaint filed by Pro Se Plaintiff Begashaw Ayele. Counsel for U.S. Security (the undersigned) contacted Mr. Ayele regarding the requested extension, and he responded that he would only agree to five days, as he is "very familiar" with the Court system. In fact, Mr. Ayele has instituted at least seven federal court lawsuits since 1996, four in the last two years.

Counsel for U.S. Security explained to Mr. Ayele that the lawsuit had just been received by U.S. Security corporate management responsible for legal matters, and that it was undertaking a review of the specific factual allegations needed to answer or otherwise respond to the Complaint. Counsel further explained that because of vacation schedules, it was requesting until August 12, 2005 to prepare its response. Mr. Ayele refused to grant his assent. Therefore, by

this Motion, U.S. Security respectfully requests that this Court grant it until August 12, 2005 to Answer or Otherwise Respond to the Complaint.

Respectfully submitted,

U.S. SECURITY ASSOCIATES, INC.,  
By their attorneys



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535 Boylston Street, Suite 1102  
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July 28, 2005

**Rule 7.1 Certification**


I, Kenneth M. Bello, counsel for Defendant U.S. Security Associates, Inc., hereby certify that in accordance with Local Rule 7.1(A)(2), I have conferred with Pro Se Plaintiff Begashaw Ayele in an attempt to resolve and narrow the issue raised in this Motion.

  
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Kenneth M. Bello

**Certificate of Service**

I, Kenneth M. Bello, counsel for Defendant U.S. Security Associates, Inc., hereby certify that a copy of the foregoing, Defendant U.S. Security Associates, Inc.'s Motion to Extend Time to Answer or Otherwise Respond to the Complaint of Pro Se Plaintiff Begashaw Ayele, was sent by Federal Express on this 28<sup>th</sup> day of July 2005 to the following:

Mr. Begashaw Ayele  
261 O'Callahagn Way #816  
South Boston, MA 02127

  
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Kenneth M. Bello